

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. S1-4:22 CR 100 RLW (SRW)
	)	
DALE HOWARD,	)	
MOISES ESCOBAR,	)	
FELIX ARMANDO RIOS-RAMIREZ,	)	
JESUS VANEGAS-RAMIREZ,	)	
PEDRO NUNEZ-RAMIREZ,	)	
JOSEPH DURKEE,	)	
MICHAEL PETERS,	)	
BOBBY REDDEN,	)	
LEAH STRICKLIN,	)	
ROBERT JOINER,	)	
OLIVIA KIMBREL,	)	
CHARLES KOZLOSKI,	)	
JOSE ALBERTO GIL-BARRERAS,	)	
JESUS ENRIQUEZ-VASQUEZ, and	)	
JESUS ROSAS-DUARTE,	)	
	)	
Defendants.	)	

**UNITED STATES OF AMERICA'S  
NOTICE OF AND MOTION FOR  
DESIGNATION OF MATTER AS A COMPLEX CASE**

COMES NOW the United States of America and respectfully requests that this Court find this matter to be a complex case within the meaning of Title 18, United States Code, Section 3161(h)(7)(B)(ii).

In support of its request, the United States respectfully suggests that, among other things, the complexity of the factual issues and the nature of the prosecution make it unreasonable to expect adequate preparation for pretrial proceedings and for the trial itself within the time limits established by Section 3161.

For example, this matter relates to, among other things, a complex drug conspiracy in which 15 members of the drug trafficking organization have been charged as named defendants. The complexity of the conspiracy has been set out in the 21-page indictment. There is extensive discovery, including law enforcement reports, search warrants, other legal process, interviews, lab examinations and drug analysis, video and photographic evidence, and wire intercepts of multiple devices (among other things) related to the alleged illegal activities undertaken by defendants and others in relation to the conspiracy, incidents, and drug trafficking organization's activities.

Accordingly, the United States respectfully suggests that the interests of justice require additional time beyond that set out in Title 18, United States Code, Sections 3161(b)(1)(D) and (H) to conclude the pretrial proceedings in this case and that the ends of justice in taking such additional time to conclude the pretrial proceedings outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, the United States of America respectfully requests that this Court designate this matter a complex case pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(ii).

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Thomas Rea  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 13, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties and counsel of record.

/s/ Thomas Rea

THOMAS REA